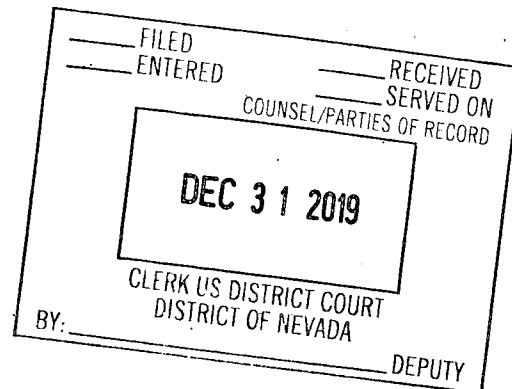




SEALED

Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336

1 NICHOLAS A. TRUTANICH
2 United States Attorney
3 District of Nevada
4 Nevada Bar Number 13644
5 BIANCA R. PUCCI
6 Assistant United States Attorney
7 District of Nevada
8 501 Las Vegas Blvd. South, Suite 1100
9 Las Vegas, Nevada 89101
(702) 388-6336
10 Bianca.Pucci@usdoj.gov



11 *Representing the United States of America*

12
13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 JACQUES ANTON LANIER,
19 A.k.a. "John Dupree,"

20 Defendant.

21 **SEALED
CRIMINAL INDICTMENT**

22 Case No. 2:19-cr- 327

23 **VIOLATIONS:**

24 18 U.S.C. §2422(b) – Coercion and Enticement

18 U.S.C. §1512(b) – Tampering with a Witness,
Victim, or an Informant

18 U.S.C. § 1591(a) and (b)(2) – Sex Trafficking
of Children

18 U.S.C. § 2423(b) – Travel with Intent to
Engage in Illicit Sexual Conduct

18 U.S.C. § 1470 – Transfer of Obscene Material
to Minor

21

22 ///

23 ///

24

1 THE GRAND JURY CHARGES THAT:

2 **COUNT ONE**
3 **Coercion and Enticement**

4 Beginning on or about April 14, 2017, and continuing to on or about September 5,
5 2017, in the State and Federal District of Nevada,

6 **JACQUES ANTON LANIER**
7 **A.k.a. "John Dupree,"**

8 defendant herein, while using a facility and means of interstate and foreign commerce, did
9 knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #2, who had not
10 attained the age of 18 years, to engage in prostitution and any sexual activity for which any
11 person could be charged with a criminal offense, to wit: *sex trafficking*, in violation of Nevada
12 Revised Statutes, Section 201.300(2)(a)(1); and *sex trafficking of children*, in violation of Title 18,
13 United States Code, Section 1591(a), all in violation of Title 18, United States Code, Section
14 2422(b).

15 **COUNT TWO**
16 **Tampering with a Witness**

17 Beginning on or about April 12, 2018, and continuing to on or about March 12, 2019,
18 in the State and Federal District of Nevada,

19 **JACQUES ANTON LANIER**
20 **A.k.a. "John Dupree,"**

21 defendant herein, did knowingly intimidate, threaten and corruptly persuade Victim #2:

22 (a) with the intent to cause and induce Victim #2 to evade legal process summoning
23 Victim #2 to appear as a witness in an official proceeding, to wit, a federal
24 criminal prosecution against defendant for *coercion and enticement*, in violation of
Title 18, United States Code, Section 2422(b), and

1 (b) with the intent to hinder, delay, and prevent the communication to a law
2 enforcement officer and judge of the United States, of information relating to the
3 commission and possible commission of a Federal offense, to wit, threatening to
4 disclose Victim #2's past sexual conduct to her parents if she testified in criminal
5 proceedings in court against defendant and coercing Victim #2 to send a
6 notarized letter to law enforcement falsely recanting a prior statement made to
7 law enforcement as being "given under duress and duplicitly,"
8 and attempted to do so, all in violation of Title 18, United States Code, Section 1512(b)(2)(C)
9 and (b)(3).

COUNT THREE

Coercion and Enticement

Beginning on or about May 4, 2017, and continuing to on or about August 31, 2017, in the State and Federal District of Nevada,

**JACQUES ANTON LANIER
A.k.a. "John Dupree,"**

15 defendant herein, while using a facility and means of interstate and foreign commerce, did
16 knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #3, who had not
17 attained the age of 18 years, to engage in prostitution and any sexual activity for which any
18 person could be charged with a criminal offense, to wit: *lewdness with a child*, in violation of
19 Nevada Revised Statutes, Section 201.230(1)(a); *statutory sexual seduction*, in violation of Nevada
20 Revised Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes,
21 Section 201.300(2)(a)(1); *sexual exploitation of children*, in violation of Title 18, United States
22 Code, Section 2251(a); and *sex trafficking of children*, in violation of Title 18, United States Code,
23 Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

COUNT FOUR

Coercion and Enticement

Beginning on or about April 18, 2017, and continuing to on or about December 6, 2017,
in the State and Federal District of Nevada,

**JACQUES ANTON LANIER
A.k.a. "John Dupree,"**

6 defendant herein, while using a facility and means of interstate and foreign commerce, did
7 knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #4, who had not
8 attained the age of 18 years, to engage in prostitution and any sexual activity for which any
9 person could be charged with a criminal offense, to wit: *lewdness with a child*, in violation of
10 Nevada Revised Statutes, Section 201.230(1)(a); *sexual assault*, in violation of Nevada Revised
11 Statutes, Section 200.366(1)(b); *statutory sexual seduction*, in violation of Nevada Revised
12 Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes, Section
13 201.300(2)(a)(1); and *sex trafficking of children*, in violation of Title 18, United States Code,
14 Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

COUNT FIVE

Coercion and Enticement

Beginning on or about August 5, 2017, and continuing to on or about October 16, 2017,
in the State and Federal District of Nevada,

**JACQUES ANTON LANIER
A.k.a. "John Dupree,"**

20 defendant herein, while using a facility and means of interstate and foreign commerce, did
21 knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #5, who had not
22 attained the age of 18 years, to engage in prostitution and any sexual activity for which any
23 person could be charged with a criminal offense, to wit: *lewdness with a child*, in violation of

1 Nevada Revised Statutes, Section 201.230(1)(a); *statutory sexual seduction*, in violation of Nevada
2 Revised Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes,
3 Section 201.300(2)(a)(1); *sexual exploitation of children*, in violation of Title 18, United States
4 Code, Section 2251(a); and *sex trafficking of children*, in violation of Title 18, United States Code,
5 Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

6 **COUNT SIX**
7 **Sex Trafficking of Children**

8 Beginning on or about August 5, 2017, and continuing to on or about October 16, 2017,
9 in the State and Federal District of Nevada,

10 **JACQUES ANTON LANIER**
11 **A.k.a. "John Dupree,"**

12 defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit,
13 entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any
14 means, Victim #5, having had a reasonable opportunity to observe Victim #5 and knowing and
15 in reckless disregard of the fact that Victim #5 had not attained the age of 18 years, and
16 knowing and in reckless disregard that Victim #5 would be caused to engage in a commercial
17 sex act, all in violation of 18 United States Code, Section 1591(a) and (b)(2).

18 **COUNT SEVEN**
19 **Coercion and Enticement**

20 Beginning on or about April 30, 2017, and continuing to on or about August 28, 2017,
21 in the State and Federal District of Nevada,

22 **JACQUES ANTON LANIER**
23 **A.k.a. "John Dupree,"**

24 defendant herein, while using a facility and means of interstate and foreign commerce, did
knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #6, who had not

1 attained the age of 18 years, to engage in prostitution and any sexual activity for which any
2 person could be charged with a criminal offense, to wit: *sex trafficking* in violation of Nevada
3 Revised Statutes, Section 201.300(2)(a)(1); and *sex trafficking of children* in violation of Title 18,
4 United States Code, Section 1591(a), all in violation of Title 18, United States Code, Section
5 2422(b).

6 **COUNT EIGHT**
7 **Sex Trafficking of Children**

8 Beginning on or about April 30, 2017, and continuing to on or about August 28, 2017,
9 in the State and Federal District of Nevada,

10 **JACQUES ANTON LANIER**
11 **A.k.a. "John Dupree,"**

12 defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit,
13 entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any
14 means, Victim #6, having had a reasonable opportunity to observe Victim #6 and knowing and
15 in reckless disregard of the fact that Victim #6 had not attained the age of 18 years, and
16 knowing and in reckless disregard that Victim #6 would be caused to engage in a commercial
17 sex act, all in violation of 18 United States Code, Section 1591(a) and (b)(2).

18 **COUNT NINE**
19 **Coercion and Enticement**

20 Beginning on or about August 30, 2017, and continuing to on or about November 30,
21 2017, in the State and Federal District of Nevada,

22 **JACQUES ANTON LANIER**
23 **A.k.a. "John Dupree,"**

24 defendant herein, while using a facility and means of interstate and foreign commerce, did

1 knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #7, who had not
2 attained the age of 18 years, to engage in prostitution and any sexual activity for which any
3 person could be charged with a criminal offense, to wit: *lewdness with a child* in violation of
4 Nevada Revised Statutes, Section 201.230(1)(a); *statutory sexual seduction*, in violation of Nevada
5 Revised Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes,
6 Section 201.300(2)(a)(1); *sexual exploitation of children*, in violation of Title 18, United States
7 Code, Section 2251(a); and *sex trafficking of children*, in violation of Title 18, United States Code,
8 Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

COUNT TEN

Coercion and Enticement

Beginning on or about August 9, 2017, and continuing to on or about November 29, 2017, in the State and Federal District of Nevada,

**JACQUES ANTON LANIER
A.k.a. "John Dupree,"**

defendant herein, while using a facility and means of interstate and foreign commerce, did knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #8, who had not attained the age of 18 years, to engage in prostitution and any sexual activity for which any person could be charged with a criminal offense, to wit: *lewdness with a child*, in violation of Nevada Revised Statutes, Section 201.230(1)(a); *statutory sexual seduction*, in violation of Nevada Revised Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes, Section 201.300(2)(a)(1); and *sex trafficking of children*, in violation of Title 18, United States Code, Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

COUNT ELEVEN

Sex Trafficking of Children

Beginning on or about August 9, 2017, and continuing to on or about November 29, 2017, in the State and Federal District of Nevada,

**JACQUES ANTON LANIER
A.k.a. "John Dupree,"**

defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means, Victim #8, having had a reasonable opportunity to observe Victim #8 and knowing and in reckless disregard of the fact that Victim #8 had not attained the age of 18 years, and knowing and in reckless disregard that Victim #8 would be caused to engage in a commercial sex act, all in violation of 18 United States Code, Section 1591(a) and (b)(2).

COUNT TWELVE

Coercion and Enticement

Beginning on or about August 31, 2017, and continuing to on or about September 7, 2017, in the State and Federal District of Nevada,

**JACQUES ANTON LANIER
A.k.a. "John Dupree,"**

defendant herein, while using a facility and means of interstate and foreign commerce, did knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #10, who had not attained the age of 18 years, to engage in prostitution and any sexual activity for which any person could be charged with a criminal offense, to wit: *human trafficking*, in violation of California Penal Code, Section 236.1; *unlawful sexual intercourse with a person under 18-years-old*, in violation of California Penal Code, Section 261.5; *lewd or lascivious acts*, in violation of

1 California Penal Code, Section 288 (effective September 9, 2010 to December 31, 2018); *oral*
2 *copulation*, in violation of California Penal Code, Section 288a (effective September 9, 2013 to
3 December 31, 2018); *sex trafficking of children*, in violation of Title 18, United States Code,
4 Section 1591(a); and *sexual exploitation of children*, in violation of Title 18, United States Code,
5 Section 2251(a), all in violation of Title 18, United States Code, Section 2422(b).

6 **COUNT THIRTEEN**
7 **Sex Trafficking of Children**

8 Beginning on or about August 31, 2017, and continuing to on or about September 7,
9 2017, in the State and Federal District of Nevada,

10 **JACQUES ANTON LANIER**
11 **A.k.a. "John Dupree,"**

12 defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit,
13 entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any
14 means, Victim #10, having had a reasonable opportunity to observe Victim #10 and knowing
15 and in reckless disregard of the fact that Victim #10 had not attained the age of 18 years, and
16 knowing and in reckless disregard that Victim #10 would be caused to engage in a commercial
17 sex act, all in violation of 18 United States Code, Section 1591(a) and (b)(2).

18 **COUNT FOURTEEN**
19 **Travel with Intent to Engage in Illicit Sexual Conduct**

20 Beginning on or about August 31, 2017, and continuing to on or about September 7,
21 2017, in the State and Federal District of Nevada,

22 **JACQUES ANTON LANIER**
23 **A.k.a. "John Dupree,"**

1 defendant herein, traveled in interstate commerce, with a motivating purpose of engaging in
2 any illicit sexual conduct with Victim #10, all in violation of 18 United States Code, Section
3 2423(b).

4 **COUNT FIFTEEN**

5 **Transfer of Obscene Material to Minor**

6 Beginning on or about August 31, 2017, and continuing to on or about September 7,
7 2017, in the State and Federal District of Nevada,

8 **JACQUES ANTON LANIER**
A.k.a. "John Dupree,"

9 defendant herein, did knowingly, and attempted to, while using the mail and any facility and
10 means of interstate and foreign commerce, transfer obscene matter to Victim #10 who had not
11 attained the age of 16 years, knowing that Victim #10 had not attained the age of 16 years, all
12 in violation of Title 18, United States Code, Sections 1470.

13 **FORFEITURE ALLEGATION ONE**

14 **Coercion and Enticement and Travel with Intent to Engage in Illicit Sexual Conduct**

15 1. The allegations contained in Counts One, Three, Four, Five, Seven, Nine, Ten,
16 Twelve, and Fourteen of this Criminal Indictment are hereby realleged and incorporated herein
17 by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2428(a)(1) and 18
18 U.S.C. § 2428(b)(1)(A) with 28 U.S.C. § 2461(c).

19 2. Upon conviction of any of the felony offenses charged in counts One, Three
20 Four, Five, Seven, Nine, Ten, Twelve, and Fourteen of this Criminal Indictment,

21 **JACQUES ANTON LANIER**
A.k.a. "John Dupree,"

1 defendant herein, shall forfeit to the United States of America, any property, real or
2 personal, that was used or intended to be used to commit or to facilitate the commission of
3 violations of 18 U.S.C. §§ 2422(b) and 2423(b):

4 defendant herein, shall forfeit to the United States of America, any property, real or
5 personal, used or intended to be used to commit or to facilitate the commission of any violation
6 of 18 U.S.C. §§ 2422(b) and 2423(b):

- 7 a. Samsung Galaxy S8 cellular phone, IMEI 355987083990480.
- 8 b. Green Vibrator recovered from 1827 W. Gowan, #2148, North Las Vegas,
9 Nevada, on December 21, 2017.

10 3. All pursuant to 18 U.S.C. §§ 2422(b), 2423(b), and 2428(a)(1) and 18 U.S.C.
11 § 2428(b)(1)(A) with 28 U.S.C. § 2461(c).

12 **FORFEITURE ALLEGATION TWO**
13 **Sex Trafficking of Children**

14 1. The allegations contained in Counts Six, Eight, Eleven, and Thirteen of this
15 Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose
16 of alleging forfeiture pursuant to 18 U.S.C. § 1594(d)(1).

17 2. Upon conviction of any of the felony offenses charged in Counts Six, Eight,
18 Eleven, and Thirteen of this Criminal Indictment,

19 **JACQUES ANTON LANIER**
20 **A.k.a. "John Dupree,"**

21 defendant herein, shall forfeit to the United States of America, any property, real or
22 personal, that was involved in, used, or intended to be used to commit or to facilitate the
23 commission of 18 U.S.C. § 1591(a), and any property traceable to such property:
24

- 1 a. Samsung Galaxy S8 cellular phone, IMEI 355987083990480.
- 2 b. Green Vibrator recovered from 1827 W. Gowan, #2148, North Las
- 3 Vegas, Nevada, on December 21, 2017.
- 4 3. All pursuant to 18 U.S.C. §§ 1591(a) and 1594(d)(1).

5 **FORFEITURE ALLEGATION THREE**
6 **Transfer of Obscene Material to Minors**

- 7 1. The allegations contained in Count Fifteen of this Criminal Indictment are
8 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture
9 pursuant to 18 U.S.C. § 1467(a)(1) and 1467(a)(3).
- 10 2. Upon conviction of any of the felony offenses charged in Count Fifteen of this
11 Criminal Indictment,

12 **JACQUES ANTON LANIER**
13 **A.k.a. "John Dupree,"**

14 defendant herein, shall forfeit to the United States of America, any obscene material
15 produced, transported, mailed, shipped, or received in violation of 18 U.S.C. § 1470:
16 defendant herein, shall forfeit to the United States of America, any property, real or
17 personal, used or intended to be used to commit or to promote the commission of 18 U.S.C.
18 § 1470:
19 a. Samsung Galaxy S8 cellular phone, IMEI 355987083990480.

20 b. Green Vibrator recovered from 1827 W. Gowan, #2148, North Las
21 Vegas, Nevada, on December 21, 2017.

1 3. All pursuant to 18 U.S.C. §§ 1467(a)(1), 1467(a)(3), and 1470.

2

3 DATED this 31st day of December, 2019.

4

A TRUE BILL:

5

/S/

6

FOREPERSON OF THE GRAND JURY

7

8 NICHOLAS A. TRUTANICH
United States Attorney

9

10 Bianca R. Pucci
11 BIANCA R. PUCCI
Assistant United States Attorney

12

13

14

15

16

17

18

19

20

21

22

23

24